

October 19, 2011

Congressional Committees

Subject: Military Training: DOD's Report on the Sustainability of Training Ranges Meets Annual Reporting Requirements but Could Be Improved

Realistic training ranges are one of the most valued assets the military has in preparing its personnel for their missions. Realistic training requires access to areas and environments that closely match the locations where the military may face combat or complex situations. International events, changes in strategy, force structure, base closures, and population growth are increasing the challenges the military faces in training its personnel to be prepared to defend the nation. Moreover, the military services report that they have increasingly lost training range capabilities because of factors such as encroachment.¹ To respond to these challenges and increase the sustainability of military ranges, the Department of Defense (DOD) has launched a number of efforts aimed at preserving training ranges while also minimizing adverse environmental effects of training activities.

As required by section 366(a) of the Bob Stump National Defense Authorization Act for Fiscal Year 2003 (as amended),² DOD was to submit a comprehensive plan for using existing authorities available to the department to address training constraints caused by limitations on the use of worldwide military lands, marine areas, and airspace to Congress at the same time as the President submitted his budget for fiscal year 2004 with annual progress reports for fiscal year 2005, extending through fiscal year 2013. To address these requirements, DOD has submitted its sustainable ranges report annually since 2004. In addition, we are required to submit annual

¹ DOD defines "encroachment" as the cumulative result of any and all outside influences that impede normal training and testing. DOD initially identified the following eight encroachment factors: endangered species and critical habitat, unexploded ordnance and munitions constituents, competition for frequency spectrum, protected marine resources, competition for airspace, air pollution, noise, and urban growth around installations.

² Pub. L. No. 107-314 (2002). Section 366 originally required reports for fiscal years 2005 through 2008. However, this requirement was extended through 2013 by section 348 of the John Warner National Defense Authorization Act for Fiscal Year 2007, Pub. L. No. 109-364 (2006). Additionally, section 1063(c)(2) of Pub. L. No. 110-181 (2008) and section 1075(g)(2) of Pub. L. No. 111-383 (2011) made clerical amendments to section 348 of Pub. L. No. 109-364.

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evaluations of DOD's reports to Congress within 90 days of receiving these reports from DOD.³ Enclosure I includes the full text of section 366, as amended.

In addition to the sustainable ranges report, DOD provides Congress the *Readiness and Environmental Protection Initiative Report*. This report is required separately under 10 U.S.C. § 2684a and describes, among other things, certain projects and other actions undertaken as part of a long-term strategy to ensure sustainability of military test and training ranges, military installations, and associated airspace.⁴ As such, this report complements the sustainable ranges report in addressing some actions taken by DOD to mitigate encroachment on military installations and ranges that require, or may reasonably require, safety or operational buffer areas. Both reports respond to statutory reporting requirements but target different aspects of DOD's efforts to capture mission requirements, current asset capability, and current and future risks to these capabilities from encroachment.

In our prior reviews of DOD's sustainable ranges reports, we noted that DOD had not addressed certain required elements when it initially submitted its comprehensive plan in 2004. Over time, we concluded that DOD had increasingly improved its report submissions and had reported on actions taken on our prior recommendations. Enclosure II provides a complete list of our prior recommendations and DOD's actions in response to them. This report is our evaluation of DOD's 2011 sustainable ranges report. In this report, we summarize our observations on the extent to which DOD's 2011 sustainable ranges report meets the requirements specified by section 366 and identify opportunities for improving future report submissions. We also discuss DOD's plans for its 2012 report submission. In accordance with the mandate, we are submitting this report to you within 90 days of receiving DOD's 2011 sustainable ranges report on July 21, 2011.

Scope and Methodology

To determine the extent to which DOD's 2011 sustainable ranges report meets the requirements specified by section 366, we reviewed DOD's 2011 report and compared it to the reporting requirements contained in section 366. In addition, we met with Office of the Under Secretary of Defense (Personnel and Readiness) and military service officials to discuss the extent to which the 2011 report meets the mandated requirements. We further discussed with these officials the extent to which opportunities exist for improving future sustainable ranges report submissions. We also compared the 2010 and 2011 reports to determine the improvements DOD had made to its sustainable ranges report. The intent of our review was not to comprehensively evaluate the data presented in the 2011 sustainable ranges report

³ This requirement was extended from 60 days to 90 days by section 348 of Pub. L. No. 109-364 (2006).

⁴ The legislation does not require GAO to evaluate DOD's *Readiness and Environmental Protection Initiative Report*.

but rather to determine the extent to which the report met mandated requirements and whether the report could be improved.

We conducted this performance audit from May 2011 through October 2011 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Results in Brief

DOD's 2011 sustainable ranges report meets the annual reporting requirement, that DOD describe the progress made in implementing its sustainable ranges plan and any additional actions taken, or to be taken, to address training constraints caused by limitations on the use of military lands, marine areas, and airspace. However, opportunities exist to improve future report submissions. DOD's 2011 report provides updates to the following four elements that section 366 required be included in DOD's original submissions in response to section 366.⁵

- *Adequacy of resources*: DOD has continued to improve the section of its report that evaluates the adequacy of existing range resources to meet requirements by (1) providing a brief description of the mission for each of DOD's ranges; (2) adding a section on historical information, results, and future projections to the individual range assessments; and (3) providing comments explaining how a range complex's capabilities or encroachment issues are affecting training and any planned actions to remedy the situation.
- *Updates of actions and milestones*: The 2011 report includes a common framework of goals and updated actions and milestones for the services to measure past performance and progress toward achieving their training and range sustainability objectives; however, the updates do not fully explain the progress made. We found that there is insufficient information presented in the 2011 report to effectively track and measure the overall progress of each action and related milestones based solely on the information presented for the respective milestone's description and estimated completion date. Specifically, it does not provide narrative to indicate whether an action or milestone has changed in comparison to its entry in the 2010 report in the following three ways: (1) some of the milestones reported in the 2011 report moved their 2010 completion dates, (2) some actions or milestones in the 2010 report do not appear in the 2011 report because they were completed in

⁵ In addition to DOD's comprehensive plan to address training constraints, section 366 also required DOD to develop a plan to improve its readiness system to reflect the readiness impact of training constraints, among other things. Since 2007, DOD has included information concerning its plans to improve its readiness reporting system in its annual sustainable ranges reports.

2010 but were not reported as such in the 2011 report, and (3) new actions or milestones appear in the 2011 report that were not listed in the 2010 report. Without this narrative, it is difficult to determine what specific progress has been achieved without performing a detailed and time-consuming comparison between the 2010 and 2011 reports. Providing this information in a future report would better explain the progress made by each of the services in meeting its planned actions and milestones.

- *Projected funding requirements:* DOD made continued progress in its 2011 report toward reporting its sustainable range funding requirements, but opportunities exist to improve future report submissions. For example, in its 2009 report DOD used the administration and support of the Army's Compatible Use Buffer program as an example of the type of projects that should be captured in the funding projections for the encroachment category. Additionally, in the 2011 report, DOD stated that any buffer projects independently budgeted for by a military service should be captured in that service's encroachment funding projections. However, in the 2011 report, we found that the Army neither provided funding projections for the administration and support of its Compatible Use Buffer program nor for the execution of buffer projects implemented under the program. In addition, while Army officials provided us with an explanation for excluding funding projections associated with its Compatible Use Buffer program, the 2011 report did not include an explanation for excluding projected funds for the program. Thus, the user of the report would have to contact the Army for the information, as we did. Furthermore, although the Office of the Under Secretary of Defense (Personnel and Readiness) directed the services to provide explanations for fluctuations greater than 10 percent between years for the 2011 sustainable ranges report as part of its internal data call to the services, not all of the services explained these fluctuations in their funding projections or explained how changes would affect the progress in implementing DOD's overall comprehensive range sustainment plan. Additionally, when we discussed funding fluctuations with Air Force officials, they discovered that an error had occurred when they inadvertently omitted funds for one of their program elements which prompted them to subsequently provide us with corrected funding projections.⁶ Explaining why projections for funding some categories were excluded from the report and explaining funding fluctuations greater than 10 percent would provide more clarity and understanding for the changes in the funding projections, improving the usefulness of the report.
- *Planned improvements to DOD's readiness system:* DOD has continued to make progress in reporting on its plans to improve the Defense Readiness Reporting System (DRRS) by incorporating training range assessment data into the system. According to a senior official in the Office of the Under Secretary of Defense (Personnel and Readiness), additional funding has

⁶ According to Air Force officials, the program element that was inadvertently omitted related to modernization and investment and operation and maintenance at the Nevada Test and Training Range and the Utah Test and Training Range.

been received and the planned completion date for full implementation of the range assessment module into DRRS is June 2012.

To improve the visibility of progress in achieving DOD's stated sustainability goals and milestones, we are recommending that DOD include a brief narrative in its next report that (1) describes the progress for each action and milestone in the goals, actions, and milestones section of the report; (2) explains the omission of funding associated with the Army's Compatible Use Buffer program; and (3) explains all fluctuations in funding projections greater than 10 percent. In written comments on a draft of this report, DOD concurred with our first recommendation and partially concurred with the remaining two recommendations, as discussed more fully later in this report.

DOD's 2011 Sustainable Ranges Report Meets the Annual Mandated Reporting Requirements, but Additional Information Could Enhance Usability

DOD's 2011 sustainable ranges report meets the annual reporting requirement that DOD describe the progress made in implementing its sustainable ranges plan and any additional actions taken, or to be taken, to address training constraints caused by limitations on the use of military lands, marine areas, and airspace. For example, DOD's 2011 report provides updates to four elements that section 366 required be included in DOD's original submissions in response to section 366: (1) evaluation of the adequacy of current DOD resources to meet current and future training range requirements (2) goals and milestones for tracking planned actions and measuring progress (3) projected funding requirements associated with implementing planned actions and (4) planned improvements to DOD's readiness reporting system to reflect the readiness impact that training range constraints have on specific units of the Armed Forces. Although we have previously reported on the progress DOD has made in these sections, additional information and clarification in some of these areas would improve the usefulness of future reports. Like previous DOD reports, the current DOD sustainable ranges report does not include any recommendations that the Secretary may have for legislative or regulatory changes to address any training constraints.⁷ However, the report provides a summary of the most recent legislative initiatives that had already been submitted to Congress for approval.

⁷ Section 366 (a)(4)(C) required the submission of any recommendations for legislative or regulatory changes to address training constraints in the 2004 comprehensive plan. While DOD has never submitted such recommendations with its sustainable ranges report, DOD explained in its 2007 report that it had an alternate mechanism in place for transmitting legislative proposals to Congress. See GAO, *Improvement Continues in DOD's Reporting on Sustainable Ranges, but Opportunities Exist to Improve Its Range Assessments and Comprehensive Plan*, [GAO-08-10R](#) (Washington, D.C.: Oct. 11, 2007).

DOD's Report Improves Its Evaluation of the Adequacy of Its Resources to Meet Current and Future Training Requirements

In reviewing the 2011 sustainable ranges report, we found that DOD has continued to improve the section of its report that evaluates the adequacy of existing range resources to meet requirements by providing increased content to the individual range assessments. Section 366(a)(2)(B) required that DOD's original sustainable ranges comprehensive plan should include an evaluation of the adequacy of current DOD resources to meet current and future training range requirements, including military lands, marine areas, and airspace available in the United States and overseas. Since 2008, each military service's individual ranges and range complexes have been assessed for their ability to support their assigned training missions using specific capability attributes and encroachment factors.⁸

DOD has continued to make improvements each year to its range assessments, including changing how the information is presented in its reports. For example, in 2009, DOD's report included detailed capability and encroachment observations provided by the military services for each training range assessed in an appendix of the report. In 2010, to improve the report's readability, DOD moved the range-specific detail from the appendix to the body of the report so that there would be a direct link between the capability and encroachment assessments and the services' observations. In the 2011 sustainable ranges report, DOD changed the display of the services' individual range assessments again to improve the context, clarity, and flow of the report. Both the capability and range assessments for each range continued to be displayed side by side, but to improve the readers' understanding of the range being assessed, a brief description of the range's mission was added above the chart's assessments. Additionally, a section on historical information, results, and future projections was added to the individual range assessments to provide a more qualitative assessment with several pieces of information. Specifically, overall composite rating scores from prior years were presented along with comments as to whether the range complex's capabilities or encroachment pressures were improving or degrading over the years and the outlook for the future. Following the assessment details were the military services' observations, including comments explaining how capability or encroachment issues were affecting training and any planned actions to remedy the situation.

According to Marine Corps officials, the Marine Corps used the historical information, results, and future projections section of the report to briefly describe how a range's capability attributes and encroachment factors were historically

⁸ Based on DOD's 2011 sustainable ranges report, the majority of the training ranges and complexes have assessments. For those ranges and complexes that were not assessed, in general, the reasons for not conducting the assessments include, but are not limited to ranges being small individual training ranges that are managed by the National Guard and state agreements and policies; ranges having limited training facilities, such as having only small arm ranges for limited purpose weapons qualification training; or ranges lacking permanent training range infrastructure.

affecting specific mission training tasks.⁹ The Marine Corps officials stated that this was the first time the Marine Corps included this level of detailed information in its training range assessments. The officials also stated that the Marine Corps will continue to conduct its range assessments based on the impact that a range's capability attributes and encroachment factors have on entire Marine Corps units' ability to conduct training. The Marine Corps included the additional detailed assessment information to better align internal range assessment methodologies. This additional information contributed to range readiness data that were more consistent with those of the other services. The inclusion of this information in DOD's 2011 report was consistent with the intent of our 2008 recommendation that the Marine Corps modify its training range assessments to include information that would address how specific training tasks are affected by a range's capability attributes and encroachment factors, thereby providing Congress and other interested parties with the additional information necessary to address and potentially fund the specific areas of training that are not considered fully mission capable.

DOD's 2011 Report Updates Actions and Milestones, but It Does Not Fully Describe Progress Made

The 2011 report includes a section on goals, actions, and milestones in which a common framework of goals was used by the services to establish supporting milestones and actions. By using a common framework of goals and related milestones, DOD and the services were able to measure past performance and progress toward achieving their training and range sustainability objectives. Section 366 (a)(3)(B) required DOD to include goals and milestones for tracking planned actions and measuring progress in its original comprehensive plan. In the 2010 sustainable ranges report, DOD included a new set of goals that DOD states are measurable, are attainable, and align with the seven sustainable ranges focus areas that the Deputy Secretary of Defense endorsed.¹⁰ However, there is insufficient information presented in the 2011 report to effectively track and measure the overall progress of each action and related milestones based solely on the information presented for the respective milestone's description and estimated completion date. Specifically, the 2011 report does not provide narrative to indicate whether an action or milestone has changed in comparison to its entry in the 2010 report. These changes include (1) milestones that appear to have moved their respective

⁹ Each Marine air-ground task force trains to execute six warfighting functions: maneuver, fires, intelligence, command and control, logistics, and force protection.

¹⁰ DOD's seven goals are to align with the seven sustainable ranges focus areas. The DOD goals are to (1) mitigate encroachment pressures on training and test activities from competing operating space (land, air, sea, space, and cyber) uses; (2) mitigate frequency spectrum competition; (3) meet military airspace challenges; (4) manage increasing military demand for range space; (5) address impacts from new energy infrastructure and renewable energy impacts; (6) anticipate climate change impacts; and (7) sustain excellence in environmental stewardship. In the 2011 report, the reference to test activities in the first goal was deleted.

completion dates, (2) actions or milestones that appear to have been completed but were omitted from the 2011 report, and (3) actions or milestones that appear to be new in the 2011 report. Without more descriptive narrative that provides progress for each of the actions and milestones, it is difficult to determine what specific progress has been achieved without performing a detailed comparison of the respective actions and milestones with those identified in the 2010 report.

Some Milestones Moved Their Respective Completion Dates

In our review of the goals, actions, and milestones included in the 2011 report, we found that about 11 percent (16 of the 142 milestones) appear to have moved their respective completion dates based on a comparison of the related milestone dates cited in the 2010 report. To illustrate, for the first goal of mitigating encroachment pressures on training activities, the Army revised its date from the second quarter of fiscal year 2010 to the fourth quarter of fiscal year 2011 for finalizing the development of its range complex master plans for selected installations. The revised date was provided in the 2011 report, but the change is only apparent by comparing it to the date in the 2010 report. According to Army officials, this change was due to its preparing new range complex master plans for several other installations and a delay in obtaining final approval of the plans. In another case involving the second goal of mitigating frequency spectrum competition, the Marine Corps revised the milestone completion date from fiscal year 2011 to fiscal year 2012 for assessing operational impacts of frequency encroachment at the range complex level. The revised date was reported in the 2011 report. The 2011 report, however, did not state that a change in the Marine Corps' milestone completion date had occurred or provide an explanation for the revised time frame. We subsequently learned from Marine Corps officials that the dates were changed because of a reorganization of the Marine Corps' regional range complex management structure and an overall change in priorities. But it took our comparison of the 2010 and 2011 reports to identify the date change and our inquiry to determine the reason for the change.

Some Actions and Milestones Included in the 2010 Report Were Not Included in the 2011 Report

We found that some actions and milestones reported in the 2010 report were subsequently not included in the 2011 report. Specifically, we found at least 15 items (12 actions and 3 milestones) reported in the 2010 report were not included in the 2011 report. Furthermore, the 2011 report does not state whether these actions and milestones were completed or not included in the report for other reasons. For example, in the 2010 report, the Air Force had an action to develop a cooperative civil and military study of future airspace requirements. This milestone was planned to be completed in fiscal year 2010. However, this Air Force action and related milestone were not included in DOD's 2011 report. We subsequently learned from Air Force officials that this action and milestone had been completed on schedule and therefore were not included in the 2011 report. However, the 2011 report does not refer to the milestone as having been completed on schedule in 2010.

Some Actions or Milestones Appeared to Be New in the 2011 Report

We were unclear whether some 2011 actions and milestones (1) were revisions to those included 2010 report or (2) were newly added since the 2010 report. We found at least 16 actions and 46 milestones that appeared new in the 2011 report without any information identifying them as new in the report. The following example of an Army action and its related milestones illustrates these two issues that made it difficult to track changes between DOD's 2010 and 2011 reports. To address DOD's third goal to meet military airspace challenges, the Army revised the completion time frame of its action to develop an unmanned aircraft systems strategy and define the Army's use of the aircraft systems from year 2024 through 2035. The 2011 report did not identify that this action was a revision to the action stated in the 2010 report. Army officials told us that the Army revised this action in its unmanned aircraft strategy in which it changed the year from 2024 to 2035. Furthermore, we found that two new milestones had been added in DOD's 2011 report to address this revised action but were not identified as new in the 2011 report. These new milestones were (1) sustain unmanned aircraft systems training at 28 locations in fiscal years 2013 through 2017 and (2) perform additional facility upgrades of unmanned aircraft systems training facilities at 28 locations in fiscal years 2013 through 2017. In another example, the Air Force included a new action and milestone in support of DOD's fifth goal to address impacts from new energy infrastructure and renewable energy impacts. The action was to create and field a DOD tracking and visualization tool for energy proposals, and the related milestone was to develop the mission compatibility awareness tool, which was planned to be completed in fiscal year 2011; however, the Air Force did not state that these were new actions and milestones in DOD's 2011 report thus making it difficult to track the progress made for 2011.

Overall, the information presented in the 2011 report is not sufficient to effectively track the progress the services have made with their actions and milestones to address DOD's seven new range sustainment goals. Including information in future reports that informs the readers when a new action or milestone is added to the report and when an action or milestone has been completed, revised, updated or deleted would better explain the progress made by each service in meeting its planned actions and milestones and would be consistent with the reporting practices used by DOD in its prior reports.

DOD Has Continued to Make Progress in Reporting Its Projected Funding Requirements, but Opportunities Exist for Improvement

We found that DOD made continued progress toward reporting its sustainable range funding requirements but opportunities exist for improving future report submissions. Section 366(a)(3)(C) required that DOD include funding projections for implementing planned range sustainment actions in its original comprehensive plan. Similar to the 2010 sustainable ranges report, the 2011 report included funding projections for

each of the military services for the current fiscal year through fiscal year 2015 across the four funding categories established in 2008.¹¹

In its 2008 report, the first report to address funding requirements, DOD established four funding categories to be used by the services when projecting their range sustainment efforts: (1) modernization and investment, (2) operation and maintenance, (3) environmental, and (4) encroachment. To address our 2008 recommendation, in its 2009 report, DOD included descriptions for the four funding categories to ensure consistent data reporting across the services along with specific examples of the types of projects that should be included in each of the categories. For example, in the 2009 report, the administration and support of the Army's Compatible Use Buffer program was identified as an example of the type of projects that could be captured in the funding projections for the encroachment category. However, in the 2011 report, we found that the Army did not provide any funding projections in the encroachment category. Army officials initially told us that funding for administration and support of the Army Compatible Use Buffer program—the Army's primary program used to address encroachment on an installation—is part of the overall Army budget for civilian manpower costs and cannot be easily broken out at the specific program level of detail. However, in subsequent discussions, Army officials stated that they will identify a process to estimate the funding associated with the Compatible Use Buffer program administration and support in the 2012 sustainable ranges report. The inclusion of this information would be consistent with DOD's example of the types of projects that should be captured in the encroachment category.

In its 2011 report, DOD made a notable change to the sustainable ranges projected funding table by including a separate funding category for Readiness and Environmental Protection Initiative program funds.¹² According to the report, separately reporting these funds is an attempt to increase the accuracy of reporting. Readiness and Environmental Protection Initiative program funds are centrally managed by the Office of the Secretary of Defense to support buffer lands initiatives. The Office of the Secretary of Defense includes these funds in its budget and subsequently allocates them to the military services based on an assessment of need. DOD therefore decided that it would be more accurate to report these funds as an Office of the Secretary of Defense program as opposed to under the military services' encroachment funding. At the same time, the respective military services' budget lines for the encroachment category are to capture any buffer projects that are independently budgeted for by that military service. We found that the Marine Corps and Navy provided funding projections in the encroachment category, while the Air Force and the Army did not provide any funding projections for this category.

¹¹ The 2010 report was the first in which DOD had reported the services' out-year funding estimates of their range sustainment efforts beyond the current budget year.

¹² The Readiness and Environmental Protection Initiative program supports DOD compatible land use and conservation partnering initiatives and projects at ranges and installations across the country. This program is a critical component of DOD's sustainable ranges initiative to prevent or reduce encroachment by protecting installation capability, accessibility, and availability for training and testing.

In the 2011 report, the Air Force stated that its reporting framework for funding Air Force training ranges does not line up precisely with the DOD's funding categories and definitions. As a result, the Air Force stated that it was unable to provide projected funds for the encroachment category. According to the Office of the Under Secretary of Defense (Personnel and Readiness) and Army officials, the Army did not include funding projections in the encroachment category for its buffer projects executed under the Army's Compatible Use Buffer program in the 2011 report because the program does not have a dedicated funding stream. Rather, the proposed Army Compatible Use Buffer projects are funded during the year of execution with unexecuted funds from other Army programs.¹³ However, this explanation is not included in the 2011 report. The inclusion of this explanation in the next report would be consistent with the reporting practices used by DOD for the other services and would provide Congress with clear information on why funds used in support of the Army Compatible Use Buffer program are not captured in the DOD sustainable ranges report.

The 2011 Sustainable Ranges Report Does Not Explain Fluctuations in Funding Projections

For the 2011 annual sustainable ranges report, the Office of the Under Secretary of Defense (Personnel and Readiness) issued a memorandum directing the services to provide explanations for funding fluctuations greater than 10 percent between each of the 5 years across the four funding categories as part of its internal data call to the services.¹⁴ Including explanations for these fluctuations in the report would inform the readers about the rationale for change as well as the impact the fluctuation may have on the services' range sustainability efforts. However, in responding to this data call, not all of the services explained the fluctuations in their funding projections or explained how changes would affect the progress in implementing DOD's overall comprehensive range sustainment plan, such as a reduction in a range's hours of operation or the number of personnel managing the range. Additionally, the 2011 report did not always include explanations for these differences between years for each of these categories. While the section of the report related to the Navy always included explanations for fluctuations greater than 10 percent in the 2011 report, the section of the report related to the Army only explained funding fluctuations for some instances, and the sections of the report related to the Marine Corps and Air Force did not explain instances of fluctuations greater than 10 percent at all. For example, in one instance, in the funding requirements section of the report, the Navy attributed a 55 percent increase in funding in the encroachment category from fiscal year 2011 to fiscal year 2012 to an increase in the installation community plans and liaison

¹³ According to Army officials, and as reported in DOD's 2011 report, the Army plans to compete for out-year Army funding to support the Army's Compatible Use Buffer program during its Program Objective Memorandum cycle for fiscal year 2013 through fiscal year 2017.

¹⁴ Office of the Under Secretary of Defense (Personnel and Readiness) memorandum, *Service Inputs to 2011 Sustainable Ranges Report (SRR) to Congress* (July 1, 2010).

officers and funding for encroachment partnering acquisition within the Navy. Similarly, in this same section of the report, the Army attributed a 51 percent increase in funding in the modernization and investment category from fiscal year 2012 to fiscal year 2013 to an increase needed for military construction funding in support of the Army Campaign Plan and Global Defense Posture Realignment implementation. The direction to explain funding fluctuations greater than 10 percent for purposes of the internal data call was initially included in the memorandum for the 2011 report, and has also been included in Office of the Under Secretary of Defense (Personnel and Readiness) guidance for the 2012 report.¹⁵

While the Office of the Under Secretary of Defense (Personnel and Readiness) guidance directed the services to explain funding fluctuations greater than 10 percent at the funding category level between years as part of DOD's internal data call, it did not direct them to explain fluctuations greater than 10 percent that may exist across the categories and fiscal years between the current and previous year's reports. However, we believe doing so would improve the reliability of the report. We compared the funding projections included in the 2010 report to those included in the 2011 report. Our analysis shows that the 2011 report does not explain fluctuations in funding projections greater than 10 percent that may exist across the funding categories and fiscal years between the current report and last year's report and does not explain how these fluctuations may affect DOD's range sustainability efforts. For example, for fiscal year 2012, the Air Force's funding projections for its modernization and investment category decreased by 56 percent, which was apparently only by comparing the 2010 report to the 2011 report. Similarly, for that same fiscal year, the Air Force's projections for its operation and maintenance category decreased by 51 percent. Subsequent to our discussions with Air Force officials concerning the reasons for these decreases, the Air Force provided us with revised funding amounts. According to these officials, an error was made in the 2011 report by inadvertently omitting funds for one of the Air Force's program elements.¹⁶ A comparison of the original funding projections included in DOD's 2011 report with the corrected Air Force funding projections is included in enclosure III of this report. The Air Force's correction to the funding projections reported in the 2011 report helped reduce the gap between the amounts reported between the 2010 and 2011 reports, but differences greater than 10 percent still exist in the modernization and investment and operation and maintenance funding categories. It took our comparison of the 2010 and 2011 reports to identify the funding change, and our inquiry led to the discovery of the funding projections error. The inclusion of this information would provide the readers with more clarity on the changes in the funding projections between the current and previous year's reports and therefore would improve the usefulness of the report.

¹⁵ Office of the Under Secretary of Defense (Personnel and Readiness) memorandum, *Service Inputs to 2012 Sustainable Ranges Report (SRR) to Congress* (Jun. 22, 2011).

¹⁶ According to Air Force officials, the program element that was inadvertently omitted related to modernization and investment and operation and maintenance at the Nevada Test and Training Range and the Utah Test and Training Range.

Overall, our analysis of the 2011 report shows that several opportunities exist for improving the funding requirements section of the 2012 sustainable ranges report. According to a senior official in the Office of the Under Secretary of Defense (Personnel and Readiness), the change in the funding projections represents risk management decisions made by the services given the overall reduction in funding for defense operations. However, the 2011 report does not consistently explain fluctuations in funding projections greater than 10 percent that may exist across the funding categories and fiscal years within the current report or between the current report and the prior report and does not explain how these fluctuations may affect DOD's range sustainability efforts. Federal internal control standards indicate that such a practice would provide a reasonable assurance of the reliability of DOD's financial reporting, including reports on budget execution and financial statements and other reports for internal and external use.¹⁷ Although the senior official in the Office of the Under Secretary of Defense (Personnel and Readiness) stated that an overall cut in the defense operations and management budget could have a variety of impacts on the sustainability of DOD ranges, such as a reduction in a range's hours of operation or the number of personnel managing the range, this information is not included in the 2011 report.

DOD's Report Describes Progress in Its Plans to Improve Its Defense Readiness Reporting System

In its 2011 report, we found that DOD has continued to make progress in reporting on its plans to improve its Defense Readiness Reporting System (DRRS) by incorporating training range assessment data into the system. Section 366(b) required DOD to report to Congress, not later than June 30, 2003, on its plans to improve its readiness reporting system to reflect the readiness impact that training constraints caused by limitations on the use of military lands, marine areas, and airspace have on specific units of the armed forces.¹⁸ According to a senior official in the Office of the Under Secretary of Defense (Personnel and Readiness), DOD used a phased concept development to enhance DRRS by establishing a range assessment module to address range resource and readiness issues. DOD has completed the first phase of development for incorporating a range assessment module into DRRS that allows the services to enter range assessment data in DRRS that are used in support of DOD's sustainable ranges reports. DOD also has developed a prototype for the second phase that will ultimately provide the capability for users of the range to examine and report the extent to which encroachment factors affect a range's ability to support various operational capabilities. The second phase ended in June 2010; however, according to the same senior official in the Office of the Under Secretary of Defense (Personnel and Readiness), because of funding shortfalls, additional testing and development required to establish the

¹⁷ GAO, *Standards for Internal Control in the Federal Government*, [GAO/AIMD-00-21.3.1](#) (Washington, D.C.: November 1999).

¹⁸ In 2002, DOD Directive 7730.65, *Department of Defense Readiness Reporting System (DRRS)*, established DRRS to measure and report on the readiness of military forces and the supporting infrastructure to meet missions and goals assigned by the Secretary of Defense.

functionality within the system to strategically examine how the ranges are and can be used was deferred to a third phase of development funded in 2011. In its 2011 report, DOD states that it will coordinate with the services to integrate range readiness from the service-specific readiness systems into DRRS and that the service representatives from the readiness community, the installation community, and the DRRS implementation offices are working closely together to ensure that these measures are implemented. To accomplish this task, according to its 2011 report, DOD is exploring the development of a business intelligence tool to collect operational readiness information in DRRS, which could then be related to range availability and capability. This tool would be made available to installation or range complex managers to help them relate encroachment with the impact on operational readiness and would serve as an important decision support tool for both the Office of the Secretary of Defense and the military services. The senior official further stated that additional funding has been received and DOD plans to have fully implemented the range assessment module into DRRS by June 2012.

DOD's Plans for Its Final Sustainable Ranges Report

Section 366 (as amended) requires that the Secretary of Defense submit the sustainable ranges report at the same time as the President's budget is submitted each year for fiscal years 2005 through 2013. This means that the 2012 report, accompanying the fiscal year 2013 budget, will be the last submission required to satisfy the section 366 reporting requirement. According to a senior official in the Office of the Under Secretary of Defense (Personnel and Readiness), the format for this final report is planned to remain substantially unchanged and the report will be an update of the 2011 report. Additionally, the senior official stated that DOD plans to continue to include key service initiatives and success stories that highlight significant areas of progress in mitigating encroachment and ensuring range sustainability. Further, the special interest section that DOD began including in its 2009 report, which allows the services to briefly highlight critical issues they are facing regarding range capabilities and encroachment, along with other general issues related to the sustainable ranges report is planned to be included in the final report. This senior official also stated that while next year marks the last year that DOD is required to issue its sustainable ranges report to Congress, DOD plans to continue to collect much of this information because it is needed to effectively manage its training range resources.

Conclusions

DOD's annual sustainable ranges report, in conjunction with other DOD reports and processes, helps to provide significant perspectives of what improvements have been made or need to be made on an annual basis to DOD's training range capabilities. DOD has met the section 366 requirement to describe the progress made in implementing its sustainable ranges plan and any additional actions taken or to be taken to address training constraints, and has continued to improve the annual reporting of its sustainable ranges. However, in reviewing DOD's 2011 sustainable ranges report, we found that additional information regarding changes to

planned actions and milestones as well as to explanations for fluctuations in the funding projections would improve these reports. For example, additional information would clarify whether (1) completion dates moved from one year to the next, (2) an action mentioned in the prior year's report but not in the current one was completed in the prior year, and (3) some actions in the current report are new. Without this clarifying information, the report becomes a snapshot in time rather than a report on progress made. Additionally, while the 2011 report shows funding projections for a 5-year budget cycle, it does not provide the rationale for omitting funding associated with the Army's Compatible Use Buffer Program, or consistently explain fluctuations in the funding projections or identify the impact the difference in funding may have on DOD's comprehensive sustainable ranges plan. Overall, such information clarifies for congressional decision makers and DOD actual progress made since the prior report as well as how best to address training shortfalls caused by any lack of or limitations on military range capabilities.

Recommendations for Executive Action

To improve the visibility of progress in achieving DOD's stated sustainability goals and milestones, and to assist congressional decision makers in determining future range sustainment fiscal needs, we recommend that the Secretary of Defense direct the Under Secretary of Defense (Personnel and Readiness), in consultation with the Secretaries of the military departments, to include the following three items in its 2012 sustainable ranges report:

- In the goals, actions, and milestones section, include a brief narrative that describes the progress made since the prior year's report for each action and milestone.
- In the funding requirements section, provide an explanation for excluding the funds required to execute buffer projects under the Compatible Use Buffer program from the Army funding projections for the encroachment category.
- In the funding requirements section, for each funding category, provide an explanation for significant fluctuations in funding projections. For example, these explanations could align with DOD's direction to the services to explain fluctuations greater than 10 percent. This would include fluctuations reported between fiscal years that are included in the current report, and fluctuations that would otherwise only be apparent by comparing the prior report to the current report.

Agency Comments and Our Evaluation

In written comments on a draft of this report, the Deputy Assistant Secretary of Defense (Readiness) concurred with our first recommendation and partially concurred with the remaining two recommendations. For our recommendation regarding updating the status of its goals, actions and milestones, DOD indicated that actions will be taken in preparing the 2012 report to address this recommendation. DOD partially concurred with our two recommendations related to

the funding requirements section. Specifically, in its comments, DOD addressed our finding regarding the inclusion of the administration and support of the Army Compatible Use Buffer program in DOD's sustainable ranges report by stating that the Army is working to estimate funding associated with these costs in DOD's 2012 report. However, DOD did not directly address our recommendation to provide an explanation for excluding the additional projected funds required to execute buffer projects under the Army's program. During our review, DOD and the Army told us that the projected costs required to execute the proposed projects under the Army Compatible Use Buffer program were not captured in the sustainable ranges report funding requirements section because the program does not have a dedicated funding stream and the projects executed under this program are funded during the year of execution with unexecuted funds from other Army programs. Our recommendation is intended to ensure that the Army also explains this to Congress in DOD's next report and not just to us. Moreover, explaining why DOD is excluding projected costs needed to execute projects under the Army's program is consistent with the reporting practices used by the Air Force where it explained why no projected funds were included in its encroachment category. Consequently, we believe that our recommendation remains valid. Finally, regarding our recommendation to provide an explanation for significant fluctuations in funding projections, DOD's response noted, in part, that the intent of the financial reporting section is to provide broad insight into future program requirements, not to serve as a financial statement for accounting purposes. However, DOD stated that it will attempt to discuss significant fluctuations in proposed funding profiles in the 2012 sustainable ranges report. Including a discussion of significant fluctuations in funding projections would meet the intent of our recommendation. DOD's comments are reprinted in enclosure IV. DOD also provided technical comments, which we have incorporated into this report as appropriate.

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We are sending copies of this report to the Secretary of Defense; the Secretaries of the Army, the Navy, and the Air Force; the Commandant of the Marine Corps; the Director, Office of Management and Budget and interested congressional committees. In addition, this report is available at no charge on the GAO website at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-4523 or leporeb@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made major contributions to this report are listed in enclosure V.

A handwritten signature in black ink, appearing to read "Brian Lepore". The signature is fluid and cursive, with the first name "Brian" and last name "Lepore" clearly distinguishable.

Brian J. Lepore, Director
Defense Capabilities and Management

Enclosures – 5

List of Committees

The Honorable Carl Levin
Chairman
The Honorable John McCain
Ranking Member
Committee on Armed Services
United States Senate

The Honorable Daniel K. Inouye
Chairman
The Honorable Thad Cochran
Ranking Member
Subcommittee on Defense
Committee on Appropriations
United States Senate

The Honorable Howard P. McKeon
Chairman
The Honorable Adam Smith
Ranking Member
Committee on Armed Services
House of Representatives

The Honorable C. W. Bill Young
Chairman
The Honorable Norman D. Dicks
Ranking Member
Subcommittee on Defense
Committee on Appropriations
House of Representatives

Section 366 of the Bob Stump National Defense Authorization Act for Fiscal Year 2003 (as amended)¹⁹

SEC. 366. Training Range Sustainment Plan, Global Status of Resources and Training System, and Training Range Inventory.

(a) PLAN REQUIRED—(1) The Secretary of Defense shall develop a comprehensive plan for using existing authorities available to the Secretary of Defense and the Secretaries of the military departments to address training constraints caused by limitations on the use of military lands, marine areas, and airspace that are available in the United States and overseas for training of the Armed Forces.

(2) As part of the preparation of the plan, the Secretary of Defense shall conduct the following:

(A) An assessment of current and future training range requirements of the Armed Forces.

(B) An evaluation of the adequacy of current Department of Defense resources (including virtual and constructive training assets as well as military lands, marine areas, and airspace available in the United States and overseas) to meet those current and future training range requirements.

(3) The plan shall include the following:

(A) Proposals to enhance training range capabilities and address any shortfalls in current Department of Defense resources identified pursuant to the assessment and evaluation conducted under paragraph (2).

(B) Goals and milestones for tracking planned actions and measuring progress.

(C) Projected funding requirements for implementing planned actions.

(D) Designation of an office in the Office of the Secretary of Defense and in each of the military departments that will have lead responsibility for overseeing implementation of the plan.

(4) At the same time as the President submits to Congress the budget for fiscal year 2004, the Secretary of Defense shall submit to Congress a report describing the progress made in implementing this subsection, including—

(A) the plan developed under paragraph (1);

¹⁹Section 366 of the Bob Stump National Defense Authorization Act for Fiscal Year 2003 was amended by Pub. L. No. 109-364, § 348 (2006); Pub. L. No. 110-181, § 1063(c)(2) (2008); and Pub. L. No. 111-383, § 1075(g)(2) (2011).

(B) the results of the assessment and evaluation conducted under paragraph (2); and

(C) any recommendations that the Secretary may have for legislative or regulatory changes to address training constraints identified pursuant to this section.

(5) At the same time as the President submits to Congress the budget for each of fiscal years 2005 through 2013, the Secretary shall submit to Congress a report describing the progress made in implementing the plan and any additional actions taken, or to be taken, to address training constraints caused by limitations on the use of military lands, marine areas, and airspace.

(b) READINESS REPORTING IMPROVEMENT----Not later than June 30, 2003, the Secretary of Defense, using existing measures within the authority of the Secretary, shall submit to Congress a report on the plans of the Department of Defense to improve the Global Status of Resources and Training System to reflect the readiness impact that training constraints caused by limitations on the use of military lands, marine areas, and airspace have on specific units of the Armed Forces.

(c) TRAINING RANGE INVENTORY---- (1) The Secretary of Defense shall develop and maintain a training range inventory for each of the Armed Forces—

(A) to identify all available operational training ranges;

(B) to identify all training capacities and capabilities available at each training range; and

(C) to identify training constraints caused by limitations on the use of military lands, marine areas, and airspace at each training range.

(2) The Secretary of Defense shall submit an initial inventory to Congress at the same time as the President submits the budget for fiscal year 2004 and shall submit an updated inventory to Congress at the same time as the President submits the budget for fiscal years 2005 through 2013.

(d) GAO EVALUATION-----The Secretary of Defense shall transmit copies of each report required by subsections (a) and (b) to the Comptroller General. Within 90 days after receiving a report, the Comptroller General shall submit to Congress an evaluation of the report.

(e) ARMED FORCES DEFINED --- In this section, the term “Armed Forces” means the Army, Navy, Air Force and Marine Corps.

List of Prior GAO Reviews and Recommendations and Department of Defense (DOD) Actions to Date

GAO recommendation	Original DOD response	DOD actions
GAO-10-977R: <i>Military Training: DOD Continues to Improve Its Report on the Sustainability of Training Ranges</i> (Sept. 14, 2010)		
No recommendations were included in the report, but the report noted that improvements were being made and that opportunities exist to improve future reports.	Concur. Agrees with report and has no specific comments.	N/A
GAO-10-103R: <i>Military Training: DOD's Report on the Sustainability of Training Ranges Addresses Most of the Congressional Reporting Requirements and Continues to Improve with Each Annual Update</i> (Oct. 27, 2009)		
Because our prior recommendation for quantifiable goals and milestones for tracking planned actions and measuring progress and our recommendation for projecting funding requirements to more fully address training constraints remain open, we did not make new recommendations in this report.	N/A	N/A
GAO-09-128R: <i>Improvement Continues in DOD's Reporting on Sustainable Ranges, but Opportunities Exist to Improve Its Range Assessments and Comprehensive Plan</i> (Dec. 15, 2008)		
Include each service's rationale for excluding the specific training ranges not included in its assessment of the adequacy of current resources to meet requirements in future sustainable ranges reports.	Concur. Future reports will incorporate rationale as to why some ranges may be included in the inventory, yet not have a capability or encroachment assessment performed.	DOD included in its 2009 report the rationale for excluding some Army and Marine Corps range assessments. In the 2010 and 2011 reports, DOD extended this rationale to all service ranges not assessed in the report.
Include the Marine Corps' individual combat training elements as the mission areas in the range capability and encroachment assessment in future sustainable ranges reports.	Did not concur. The Marine Corps' approach to assessing range capability and encroachment is consistent with all the source documents and methodologies by which the Marine Corps manages and resources its ranges. The capabilities assessments are designed to measure the ranges' ability to support the levels of training on the Marine Corps training continuum. Those levels of training are all based on established training responsibilities embodied in Marine Corps Tasks. In future reports, they will provide greater explanatory comments on both capabilities and encroachment impacts, but the framework established in their Required Range Capabilities Document, range complex management plans, and range management orders all	(Recommendation implemented) During our 2009 review, DOD officials told us that the Marine Corps is considering how best to provide future assessments to include greater detail in response to an increased emphasis on developing consistent measures for DOD readiness reporting. In the 2011 DOD report, the Marine Corps included the additional range readiness data that are more consistent with those of other services. (Recommendation implemented)

GAO recommendation	Original DOD response	DOD actions
	support the methodology they have employed in this report.	
Update on the actions taken by the Air Force to address DOD's modernization and investment goals for range sustainment in future sustainable ranges reports.	Concur. Updates of actions taken by each Service over the proceeding year towards completion of goals and milestones will be addressed.	DOD reported in its 2009 report that the Air Force still had not taken any action to address the modernization and investment goal. However, in its 2010 report, DOD included a set of seven new goals after determining in 2009 that many of the goals and milestones used in previous reports either had been overcome by other events or outlived their relevance. DOD stated that these seven new goals more closely aligned with the seven focus areas endorsed by the sustainable ranges integrated product team. The Air Force had provided actions and milestones with measurable end dates for all of the new goals except for mitigating frequency spectrum competition which is to be determined. In the DOD 2011 report, the Air Force included an action and milestone to address this goal. (Recommendation implemented)
Include a detailed description of all funding data included in each funding category, for each of the military services in future sustainable ranges reports.	Concur. The Office of the Secretary of Defense will work with the Services to provide a more detailed description of what areas are financed within each of the funding categories.	Since 2009, in response to our recommendation, DOD included a table with specific examples for each of the four funding categories. (Recommendation implemented)
GAO-08-10R: <i>Improvement Continues in DOD's Reporting on Sustainable Ranges, but Opportunities Exist to Improve Its Range Assessments and Comprehensive Plan</i> (Oct. 11, 2007)		
Develop clear criteria and standard methods for assessing current and future training range requirements and capabilities.	Concur. Will continue to develop and improve the criteria and methodology associated with our range requirements and capabilities assessment processes in our subsequent reports.	In response to our recommendation, DOD established standardized criteria and identified common factors to assess range capabilities and encroachment in the 2008 sustainable ranges report. Since 2008, DOD has continued to use these standardized criteria and common factors to address the adequacy of its resources in meeting current and future requirements. (Recommendation implemented)
Include funding information on the services' range sustainment efforts in future reports.	Concur. Programming funding data associated with range sustainment will be captured and documented in future Sustainable Ranges Reports to Congress to the extent possible. However, any funding data presented beyond the current year will be subject to a caveat that final Service budgets for out years are subject to change.	In response to our recommendation, DOD included funding projections in its 2008 report for fiscal years 2008 and 2009. Additionally, in its 2010 report, DOD provided training range funding projections through fiscal year 2015. DOD also included footnotes to the table providing an explanation as to how some funding requirements are

GAO recommendation	Original DOD response	DOD actions
		determined. (Recommendation implemented)
GAO-06-725R: Improvement Continues in DOD's Reporting on Sustainable Ranges but Additional Time Is Needed to Fully Implement Key Initiatives (June 20, 2006)		
Because our previous recommendations remained open, we did not recommend any new executive actions in this report.	N/A	N/A
GAO-06-29R: Some Improvements Have Been Made in DOD's Annual Training Range Reporting but It Still Fails to Fully Address Congressional Requirements (Oct. 25, 2005)		
Because our prior recommendations for improving the Office of the Secretary of Defense's annual training range reporting remained open, valid, and not fully addressed, we did not make new recommendations in this report.	N/A	N/A
GAO-04-608: Military Training: DOD Report on Training Ranges Does Not Fully Address Congressional Reporting Requirements (June 4, 2004)		
Develop an integrated training range database that identifies available training resources, specific capacities and capabilities, and training constraints caused by limitations on the use of training ranges, which could be continuously updated and shared among the services at all command levels, regardless of service ownership.	Did not concur. Each military service already processes and is improving range information systems that address the features described in this recommendation. Further, DOD agrees that, as a long-term goal these systems should be linked to support joint use. It is DOD policy to document encroachment concerns and environmental considerations and improve information systems related to range management. The services and the Office of the Secretary of Defense are moving forward in a deliberate approach that builds on existing systems and carefully manages the costs and risks inherent in information system integration and development. As part of our yearly section 366 reports, DOD will document progress in this evolutionary effort to link and improve the Service range information systems. However, DOD non-concurs with the recommendation. It must be recognized that each Service operates ranges to meet specific training requirements. While increased cross-Service or cross-functional use is a DOD goal, it does not resolve training constraints brought about by encroachment.	Although DOD did not concur with our recommendation to develop a stand-alone training range database, DOD is developing a range module to be included in the Defense Readiness Reporting System (DRRS) which will provide an integrated database and assessment capability for available training resources and constraints. DOD has continued to make progress in its plans to improve its DRRS by incorporating training range assessment data into the system. According to the Office of the Secretary of Defense officials, additional funding has been received and the planned completion date for full implementation of the range assessment module into DRRS is planned for June 2012. Upon completion, the module will provide the user with a strategic look at how ranges are being used and allow integration of unit commanders assessments that relate to range capabilities. (Implementation of recommendation is in process)
Develop a comprehensive plan, which includes quantifiable goals and milestones for tracking planned actions and measuring progress,	Concur. Meeting section 366 requirements can be accomplished only through a long-term approach. Under the Office of the Secretary of	In response to our recommendation, DOD included broad goals and some milestones in its 2005 report. In its 2010 report,

GAO recommendation	Original DOD response	DOD actions
and projected funding requirements to more fully address identified training constraints.	Defense leadership, each of the military services has initiated an enhanced range management and comprehensive planning process, as an integral element of expanding range sustainability programs. In line with this evolution, future reports will more fully address goals and milestones and project funding requirements associated with these comprehensive plans. DOD is and will continue to execute a comprehensive program to improve sustainability of its ranges, and disagrees with the implication in this recommendation that it does not.	DOD included a new set of goals that it states are measurable, attainable, and more in line with the Integrated Product Team's focus areas. The report outlines which offices in each of the military services are responsible for actions needed to achieve each milestone. The report also outlines actions and milestones for each service to meet a particular goal and provides measurable dates for when each milestone is to be accomplished. DOD officials stated that actions will be reviewed and updated as necessary during monthly Working Integrated Product Team meetings. In its 2011 report, DOD continued to provide updated actions and milestones to address these goals. Additionally, the 2011 report provides training range funding projections through fiscal year 2015. (Recommendation implemented)
Assess current and future training range requirements and evaluate the adequacy of current resources to meet these requirements.	Did not concur. DOD has begun a program to better define range requirements. Because a valid requirements base must be a bottom-up process, this effort entails detailed work at each installation. It is unclear why GAO chose to not examine these efforts. Also, it is both impractical and inappropriate to include this level of detail in an Office of the Secretary of Defense-level report. DOD believes that the Congress is better served if it describes, summarizes, and analyzes training requirements in its section 366 report, rather than simply providing the requirements themselves.	In its 2007 report, DOD conducted its initial assessment of the services' range capabilities and the external pressures that constrain training ranges. These assessments were presented in table format to convey the severity of impacts caused by shortfalls in required capabilities. While these assessments were an important first step; they were based on data that were not completed or accurate enough to reflect current conditions. In its 2008 report DOD included a set of standardized criteria (13 range capability attributes and 12 encroachment factors) for evaluating the adequacy of each services current resources to meet current and future requirements. Since 2008, DOD has continued to use these standardized criteria and common factors to address the adequacy of its resources in meeting current and future requirements. (Recommendation implemented)
Develop a readiness reporting system to reflect the impact on readiness caused by training constraints due to limitations on the use of training ranges.	Did not concur. DOD stated that it is inappropriate to modify the Global Status of Resources Training System report to address encroachment. DOD believes it is best to assess how encroachment impacts affect the ability of installations and ranges to conduct	According to DOD officials, the initial phase of DRRS is operational and incorporates the capability and encroachment assessments for training contained in the sustainable ranges report. This phase was completed in May 2009. Currently the Range Assessment

GAO recommendation	Original DOD response	DOD actions
	training and testing. DOD plans to incorporate encroachment impacts on readiness into the Defense Readiness Reporting System (DRRS), which is currently under development.	<p>Module shows information at the unit level. DOD is continuing to update the module in an effort to provide the end user with a more strategic assessment of individual range capabilities. This module is planned to be completed and fully implemented by June 2012.</p> <p>(Implementation of recommendation is in process)</p>

Sources: GAO and DOD.

**Original Air Force Funding Projections Included in DOD's 2011 Sustainable
Ranges Report and Corrected Funding Projections**

Dollars in millions					
Funding categories	FY 2011	FY 2012	FY 2013	FY 2014	FY 2015
Original Air Force funding projections					
Modernization and investment	\$60.40	\$53.60	\$49.10	\$47.20	\$39.40
Operation and maintenance	89.60	91.10	80.90	82.50	85.60
Environmental	26.80	27.70	26.10	25.60	26.20
Encroachment	0	0	0	0	0
Total original funding	\$176.80	\$172.40	\$156.10	\$155.30	\$151.20
Corrected Air Force funding projections					
Modernization and investment	\$60.40	\$98.19	\$88.86	\$96.32	\$87.97
Operation and maintenance	175.13	174.72	146.54	150.46	149.15
Environmental	26.80	27.70	26.10	25.60	26.20
Encroachment	0	0	0	0	0
Total corrected funding	\$262.33	\$300.61	\$261.50	\$272.38	\$263.32
Differences between original and corrected Air Force funding projections					
Modernization and investment	\$0	\$44.59	\$39.76	\$49.12	\$48.57
Operation and maintenance	85.53	83.62	65.64	67.96	63.55
Environmental	0	0	0	0	0
Encroachment	0	0	0	0	0
Total differences in funding	\$85.53	\$128.21	\$105.40	\$117.08	\$112.12

Source: GAO analysis of DOD and Air Force data.

Comments from the Department of Defense



OFFICE OF THE UNDER SECRETARY OF DEFENSE
4000 DEFENSE PENTAGON
WASHINGTON, D.C. 20301-4000

OCT 17 2011

Mr. Brian J. Lepore
Director, Defense Capabilities and Management Team
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Mr. Lepore:

This is the Department of Defense (DoD) response to the Government Accountability Office Draft Report, GAO-12-13R, "MILITARY TRAINING: DoD's Report on the Sustainability of Training Ranges Meets Annual Reporting Requirements but Could be Improved," dated September 28, 2011 (GAO Code 351615).

Thank you for the opportunity to comment on this draft. The DoD appreciates the opportunity to work with the GAO to continually improve reporting on the ability of our training ranges to meet the needs of the warfighter. While the Department agrees in general with the report, we find the recommendations to be of an administrative nature vice substantive. Also, as the intent of the financial reporting section is to provide broad insight into future program requirements, viewing this information through the rigor of internal control standards may not apply in this case.

DoD responses on the specific GAO recommendations are enclosed.

Sincerely,

Laura J. Junor
Deputy Assistant Secretary of Defense
Readiness

Enclosure:
As stated

GAO Draft Report Dated SEPTEMBER 28, 2011

GAO-12-13R (GAO CODE 351615)

**"MILITARY TRAINING: DOD'S REPORT ON THE SUSTAINABILITY OF
TRAINING RANGES MEETS ANNUAL REPORTING REQUIREMENTS BUT
COULD BE IMPROVED"**

**DEPARTMENT OF DEFENSE COMMENTS
TO THE GAO RECOMMENDATIONS**

RECOMMENDATION 1: The GAO recommends that the Secretary of Defense direct the Under Secretary of Defense (Personnel and Readiness), in consultation with the Secretaries of the military departments, to include in its 2012 sustainable ranges report: In the goals, actions, and milestones section, include a brief narrative that describes the progress made since the prior year's report for each action and milestone. (See page 22/GAO Draft Report.)

DoD RESPONSE: Concur. Additional information will be included in the 2012 Report to reflect progress made since the 2011 Report.

RECOMMENDATION 2: The GAO recommends that the Secretary of Defense direct the Under Secretary of Defense (Personnel and Readiness), in consultation with the Secretaries of the military departments, to include in its 2012 sustainable ranges report: In the funding requirements section, provide an explanation for excluding the funds required to execute buffer projects under the Compatible Use Buffer Program from the Army funding projections for the encroachment category. (See page 22/GAO Draft Report.)

DoD RESPONSE: Partially Concur. As noted in this draft report, the Department has explained that the Army's Compatible Use Buffer (ACUB) initiative is not a program of record with its own dedicated funding stream. The Army has stated that they are working to estimate funding associated with ACUB administration and support in the 2012 Report.

RECOMMENDATION 3: The GAO recommends that the Secretary of Defense direct the Under Secretary of Defense (Personnel and Readiness), in consultation with the Secretaries of the military departments, to include in its 2012 sustainable ranges report: In the funding requirements section, for each funding category, provide an explanation for significant fluctuations in funding projections. For example, these explanations could align with DoD's direction to the services to explain fluctuations greater than 10 percent. This would include fluctuations reported between fiscal years that are included in the current report, and fluctuations that would otherwise only be apparent by comparing the prior report to the current report. (See pages 22 and 23/GAO Draft Report.)

DoD RESPONSE: Partially Concur. The Sustainable Ranges Report (SRR) provides Congress with information summarizing the assessment of Service range capabilities and potential threats to those capabilities from encroachment using like data sets. More broadly, the purpose is to assure Congress that the Services are effectively managing the resources entrusted to them in the areas of range and encroachment management. The intent of the financial reporting section is to provide broad insight into future program requirements, not to serve as a financial statement for accounting purposes. Nonetheless, the Department will attempt to discuss significant fluctuations in proposed funding profiles in the 2012 SRR.

GAO Contact and Staff Acknowledgments

GAO Contact

Brian J. Lepore, (202) 512-4523 or leporeb@gao.gov

Staff Acknowledgments

In addition to the contact named above, GAO staff who made key contributions to this report include Harold Reich, Assistant Director; Larry Bridges; Grace Coleman; Jacqueline McColl; Charles Perdue; John Van Schaik; and Michael Willems.

Related GAO Products

Military Training: DOD Continues to Improve Its Report on the Sustainability of Training Ranges. [GAO-10-977R](#). Washington, D.C.: September 14, 2010.

Military Training: DOD's Report on the Sustainability of Training Ranges Addresses Most of the Congressional Reporting Requirements and Continues to Improve with Each Annual Update. [GAO-10-103R](#). Washington, D.C.: October 27, 2009.

Improvement Continues in DOD's Reporting on Sustainable Ranges, but Opportunities Exist to Improve Its Range Assessments and Comprehensive Plan. [GAO-09-128R](#). Washington, D.C.: December 15, 2008.

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